

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

LESTER LEE,
Plaintiff Pro Se

v. Case No. 8:24-cv-01205-ABA

BROOKSIDE PARK CONDOMINIUM, INC.,
METROPOLIS (aka MCM, INC.),
RAMMY AZOULAY, and
LAMONT SAVOY,
Defendants.

**DECLARATION OF LESTER LEE IN SUPPORT OF MOTION TO STRIKE
ABUSIVE DISCOVERY**

I, Lester Lee, hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 as follows:

1. I am the Plaintiff in the above-captioned case. I submit this declaration in support of my Motion to Strike Abusive Discovery.
2. I am proceeding pro se and have disabilities that affect my ability to manage large-scale litigation tasks without reasonable accommodation.
3. Defendants have served an excessive number of interrogatories across three sets of discovery, in total exceeding 80 questions. This violates the numerical limitation of 25 interrogatories per party under Rule 33(a)(1), especially since the Defendants are acting in coordination and/or represented jointly.
4. These interrogatories were not only excessive but also retaliatory, harassing, and unrelated to the legitimate issues in this case. Many of them appear to have been drafted with the intent to intimidate or mischaracterize my housing history, service dog status, or personal character.

5. Several of the discovery responses attributed to me were **never finalized, signed, or authorized** by me. My former attorney drafted preliminary responses while I was still determining how to proceed. I did not approve them for formal submission.
6. Despite this, the defense knowingly cited and used these **unauthorized draft responses** in their Motion to Dismiss as if they were valid. They did so without verifying that I had signed or formally adopted them, and knowing that I had raised concerns about coordinated abuse of discovery.
7. I believe the defendants are intentionally using discovery as a tool to harass and exhaust me procedurally because they cannot prevail on the facts or law. They are attempting to force procedural failure by flooding me with documents and forcing me to respond without adequate resources.
8. In addition, during my deposition, defense counsel acted inappropriately by berating my former attorney for objecting and making intimidating remarks in my presence. This was part of a broader pattern of unprofessional conduct and discovery-related coercion.
9. I respectfully ask this Court to strike the abusive discovery, prohibit further coordinated interrogatories, and issue sanctions as the Court sees fit.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 16th day of June, 2025.

Respectfully submitted

Lester Lee

Plaintiff Pro Se

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